



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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October 6, 2021

**BY ECF**

Honorable Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Shaw-Nae Dixon at al.v. Bill De Blasio, et al., Civil Case No. 21-cv-5090

Dear Judge Cogan:

We are attorneys in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, counsel for defendants in the above-referenced action. Defendants respectfully request that their time to respond to the Complaint be extended by thirty days from the date the Court issues a decision on Plaintiffs' motion for a preliminary injunction.

Defendants seek the extension due to the time spent drafting opposition to Plaintiff's motion for preliminary injunction, which was filed on October 5, 2021, and time needed to prepare for argument on the motion scheduled on October 8, 2021. Moreover, the decision on the motion for a preliminary injunction will inform how defendants proceed with respect to the underlying litigation..

This is the Defendants' first request for an extension of time to answer or otherwise respond to the Complaint. We have reached out to Plaintiffs' counsel and obtained his consent to this extension. The only scheduled date for this action is October 8, 2021 for oral argument on Plaintiffs' preliminary injunction application, which is unaffected by this request. Currently, there are no other scheduled Court dates in this action.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Jasmine Paul and Kerri Devine

Jasmine Paul and Kerri Devine

Assistant Corporation Counsel

cc: Ronald A. Berutti, Esq. (by ECF)  
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